

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

In Re Mammoth Energy Services, Inc.  
Consolidated Stockholder Litigation

C.A. No. 19-1682 (RGA)

**PLAINTIFFS' UNOPPOSED MOTION FOR  
PRELIMINARY APPROVAL OF SETTLEMENT**

Plaintiffs Aaron Randall, Mohammad Shaer, and Christopher Jones (“Plaintiffs”) hereby move this Court, pursuant to Rule 23.1 of the Federal Rules of Civil Procedure, for entry of an order: (1) granting preliminary approval of the proposed Settlement as set forth in the Stipulation and Agreement of Settlement dated October 5, 2021 (the “Stipulation”)<sup>1</sup>; (2) approving the Parties’ proposed method and manner of providing notice of the Settlement to Mammoth Energy Services, Inc. shareholders; (3) scheduling a hearing at which time the Court will consider whether the proposed Settlement should be granted final approval; and (4) granting such other relief as the Court deems just and proper.

In connection with preliminary approval of the Settlement, Plaintiffs request that the Court establish dates by which, among other things, the Notice will be disseminated to Current Mammoth Shareholders, by which Current Mammoth Shareholders may comment on the Settlement, and for the Settlement Hearing. Plaintiffs respectfully request that the Court establish the schedule set forth below.

<b>Event</b>	<b>Deadline</b>
Deadline for disseminating the Notice via a press release on <i>GlobeNewswire</i> , filing the Notice and the Stipulation with the SEC as exhibits to a Form 8-K,	Not later than five (5) business days following the entry of the Preliminary Approval Order

<sup>1</sup> Unless otherwise defined herein, all defined terms shall have the meanings as set forth in the Stipulation, which is attached as Exhibit 1 to the Declaration of Gregory M. Nespole in Support of Plaintiffs’ Unopposed Motion for Preliminary Approval of Settlement.

and posting the Notice and the Stipulation on the Investor Relations page of Mammoth's corporate website	
Deadline for filing all papers in support of the final approval of Settlement and the Fee and Expense Amount	At least thirty-five (35) calendar days prior to the Settlement Hearing
Deadline for any objections by Current Mammoth Shareholders to the Settlement to be filed with the Court and served on counsel for the Parties	At least fourteen (14) days prior to the Settlement Hearing
Deadline for Defendants' Counsel to file proof with the Court of the dissemination of the Notice by affidavit or declaration	At least ten (10) calendar days following the entry of the Preliminary Approval Order
Settlement Hearing Date	At least fifty-five (55) days after the deadline to disseminate the Notice to Current Mammoth Shareholders

In support of this motion, Plaintiffs rely upon the accompanying Brief in Support, the Declaration of Gregory M. Nespole in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Settlement and the exhibits annexed thereto, the Stipulation and exhibits annexed thereto, and all prior pleadings and proceedings.

The Parties' agreed-upon form of proposed Preliminary Approval Order is attached as Exhibit C to the Stipulation. Plaintiffs respectfully request that the Court enter the proposed Preliminary Approval Order and insert a date for the final settlement hearing in paragraph 2.

Defendants do not oppose this motion.

Dated: October 5, 2021

Respectfully submitted,

Of Counsel:

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